

KHAN vs Hemosphere et. al.

RECEIVED

1:18-cv-05368

2020 DEC -4 AM 9:33

To the honorable judge Virginia Kendall

The plaintiff will file a motion to the Supreme court writ of certiorari on December 2<sup>nd</sup> 2020 challenging rule 11 sanctions. Plaintiff will be represented by Haug Partners LLP, 745 Fifth Avenue, New York, NY 10151, tel.: +12125880800, +12128632643, Jonathan Herstoff, Camille Y. Turner, Kaitlin M. Abrams.

Under three standards of Supreme court:

1. There is a reasonable probability that four justice will consider our issue meritorious to grant certiorari.
2. Majority of the court will vote to reverse the judgment.
3. Irreparable harm will result if you will not stay the sanctions.

The plaintiff has to recover the sanctions from more than 100 defendants and the plaintiff cannot file lawsuits in hundreds of courts outside of Illinois to recover the sanctions. See Hollingsworth v. Perry, 558 U.S. 183, 190, 130 S. Ct. 705 L.Ed.2d 657 (2010), Americal axle & Manufacturing INC, Plaintiff, vs Neapco holding LLC, defendant., 977 F.3d 1379 (2020). The plaintiff requests to stay the sanctions till Supreme court decides the case.

Sincerely yours,

/s/ Nazir Khan *Nazir Khan*

/s/ Iftikhar Khan

150 Glenmora Drive

Burr Ridge, IL 60527

C: 312-590-0589

P: 312-329-1100

F: 312-329-1106

**FILED**

DEC 04 2020

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT